

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**IN RE CHINA MEDIAEXPRESS
HOLDINGS, INC. SHAREHOLDER
LITIGATION**

Civil Action No. 11-cv-0804 (VM)

CLASS ACTION

This Document Relates To:

ALL ACTIONS

NOTICE OF MOTION TO DISMISS THE COMPLAINT

PLEASE TAKE NOTICE, that for the reasons set forth in the accompanying Memorandum of Law of Defendant A.J. Robbins (hereinafter “Robbins”) in support of its Motion to Dismiss Plaintiffs’ Amended and Consolidated Complaint (hereinafter “Complaint”) together with the attached Declaration of Michael E. Marr, Esq. dated February 6, 2012 with attached Exhibits A-V, Defendant Robbins by and through its undersigned counsel hereby moves the Court, the Honorable Victor Marrero presiding, for a date and time designated by the Court for the purpose of entering an Order pursuant to Rule 8(a), 9(b), 12(b)(6), and 23.1 of the Federal Rules of Civil Procedure and the Private Securities Litigation Reform Act of 1995 for an order dismissing this action with prejudice as it pertains to Defendant A.J. Robbins, P.C.

Dated: February 6, 2012.

Respectfully submitted,

/s/ Michael E. Marr, Pro Hac Vice .

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 6th day of February, 2012, I caused to be electronically filed the foregoing Motion to Dismiss by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record who have registered to receive notices from the court under the CM/ECF system and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

/s/ Michael E. Marr, Pro Hac Vice .

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